

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

Criminal No. 25-19

ANDY HA

**MOTION FOR PRELIMINARY ORDER OF CRIMINAL FORFEITURE
AGAINST ANDY HA**

AND NOW comes the United States of America, by and through its counsel, Troy Rivetti, United States Attorney for the Western District of Pennsylvania, and Jill L. Locnikar, Assistant United States Attorney for the Western District of Pennsylvania, and pursuant to Federal Rule of Criminal Procedure 32.2, respectfully moves for a preliminary order of forfeiture, and in support thereof, represents as follows:

1. On February 24, 2025, Andy Ha (“Ha”) entered a guilty plea to Counts One and Two of the Information at Criminal No. 25-19. Ha also agreed to forfeit all right, title, and interest in the following property, further identified by asset identification numbers 24-ICE-000489 and 24-CBP-000455 (the “Subject Property”), to the United States, pursuant to 8 U.S.C. § 1324(b) and 18 U.S.C. § 981(a)(1)(C): \$485,476.00 in United States currency seized on March 17, 2024; and \$473,333.00 in United States currency seized on February 18, 2024.

2. The United States respectfully requests that the Court enter a Preliminary Order of Criminal Forfeiture and that the forfeiture of Ha’s interest in the Subject Property be incorporated into his sentence and judgment pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure.

3. Upon the issuance of the Preliminary Order of forfeiture against Ha, the United States will provide written notice to all third parties, if any, known to the United States who may

have an interest in the Subject Property. The United States will also advertise notice of this forfeiture proceeding via the government's internet forfeiture website.

WHEREFORE, the United States respectfully requests that this Honorable Court enter a Preliminary Order of Criminal Forfeiture forfeiting to the United States all right, title, and interest of the defendant in the Subject Property, and that the forfeiture of the defendant's interest in the Subject Property be incorporated into his sentence and judgment.

Respectfully submitted,

TROY RIVETTI
Acting United States Attorney

/s/ Jill L. Locnikar
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CERTIFICATE OF SERVICE

I hereby certify that the United States' Motion for Preliminary Order of Criminal Forfeiture against Andy Ha has been served through the electronic filing system this 3rd day of March, 2025, upon the following:

Michael Machen, Esquire
mmjjmachen@yahoo.com

/s/ Jill L. Locnikar
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